



## MEMORANDUM

**TO:** Jard Company Inc. Site File

**cc:** Daniel Burke, U.S. Environmental Protection Agency On-Scene Coordinator  
John M. Carlson, U.S. Environmental Protection Agency Response Project Officer

**FROM:** Terri Qualters, <sup>TE</sup> Roy F. Weston, Inc., Superfund Technical Assessment and Response Team

**DATE:** 20 October 1998

**SUBJ:** Removal Action conducted from 21 September through 2 October 1998  
TDD No. 98-09-0002, PCS No. 5539, DC No. R-1640

From 21 September through 2 October 1998, personnel representing IT/OHM Remediation Services, Inc. (IT/OHM), and the Roy F. Weston, Inc., Superfund Technical Assessment and Response Team (START) conducted removal actions at the Jard Company Inc., Site (the Site) located along Bowen Road in Bennington, Bennington County, Vermont (see Attachment I - Site Location Map). The site is the location of a former capacitor manufacturing facility, which encompasses approximately 11 acres. The Site consists of an approximate 70,000 square-foot manufacturing building, paved parking areas, a flood control berm, and a wooded area to the south of the facility (see Attachment II - Site Diagram). The site is bound by Bowen Road to the north, a State of Vermont, Agency of Transportation garage to the northeast, an undeveloped lot to the east, the Roaring Branch of the Walloomsac River to the south, and baseball fields and an undeveloped lot to the west.

On 15 September 1998, U.S. Environmental Protection Agency (US EPA) On-Scene Coordinator (OSC) Daniel Burke, IT/OHM Response Manager (RM) Joseph Fort, and START member Terri Qualters conducted a site walk-through to delineate the area where polychlorinated biphenyl (PCB)-contaminated soil would subsequently be removed. The established area to be excavated was based on surface soil sampling results ranging from 0 to 50 parts per million (ppm) obtained during a Preliminary Assessment/Site Investigation (PA/SI) conducted by START personnel on 16, 23-25 June and 7 July 1998.

On 21 September 1998, RM Fort, IT/OHM personnel John Caron, Richard Speilman, and Wayne Bullock, and START member Qualters mobilized to the Site. Once at the Site, START member Qualters conducted photodocumentation of the Site prior to the commencement of tree clearing and soil removal activities.

From 21 through 25 September 1998, IT/OHM personnel prepared the area to be excavated by cutting down several trees and removing a portion of a chain-link fence which would enable an excavator and dump trailers to access the area where contaminated soil was located on the Site. IT/OHM also repaired portions of the chain-link fence to deter potential vandalism on the Site, and

subsequently began excavating soil with an excavator to a depth of 2 feet in the area previously outlined by OSC Burke. Following excavation, contaminated soils were stockpiled onsite to await off-site disposal. Site activities were conducted in accordance with the site health and safety plan (HASP) which has been prepared as a separate document entitled *Health and Safety Plan for the Jard Company, Inc. Site, Bennington, Bennington County, Vermont*. A large portion of the excavation area contained large boulders presumed to be remnant of the Walloomsac Riverbed. The river is thought to have occasionally flooded the excavation area and/or the site prior to the construction of the flood control berm which runs the length of the site. Excavation activities did not entail removing any portion of that berm (see Attachment III - Extent of Excavation Map).

On 28 September 1998, IT/OHM personnel, and START member Qualters arrived at the Site to prepare for PCB-contaminated soil load-out activities scheduled to commence on 29 September 1998. START member Qualters conducted preliminary air monitoring using a data mini-ram to detect total respirable dust. The results of the air monitoring were below the 2 milligrams per cubic meter ( $\text{mg}/\text{m}^3$ ) action level for respirable dust, as established in the HASP.

On 29 September 1998, six dump trailers, containing a combined total volume of 140.97 tons of contaminated soil, were loaded and shipped to Chemical Waste Management (Chem Waste), located in Model City, New York. START member Qualters conducted air monitoring during shipping activities, using a data mini-ram to detect total respirable dust. The results of the air monitoring were below the 2  $\text{mg}/\text{m}^3$  action level for respirable dust, as established in the HASP.

On 30 September 1998, nine dump trailers, containing a combined total volume of 242.68 tons of contaminated soil, were loaded and shipped to Chem Waste. START member Qualters conducted air monitoring for a half-day before rain began, using a data mini-ram to detect total respirable dust. The results of the air monitoring were below the 2  $\text{mg}/\text{m}^3$  action level for respirable dust, as established in the HASP.

On 1 October 1998, four dump trailers containing a combined total volume of 101.972 tons of contaminated soil, were loaded and shipped to Chem Waste. As a result of rain conditions at the Site, START member Qualters did not conduct air monitoring.

On 2 October 1998, three dump trailers, containing a combined total volume of 89.19 tons of contaminated soil, were loaded and shipped to Chem Waste. A total of 574.812 tons of contaminated soil was excavated and disposed during removal activities (see Attachment IV - Off-Site Disposal Summary). As a result of rain conditions in the morning at the Site, START member Qualters did not conduct air monitoring.

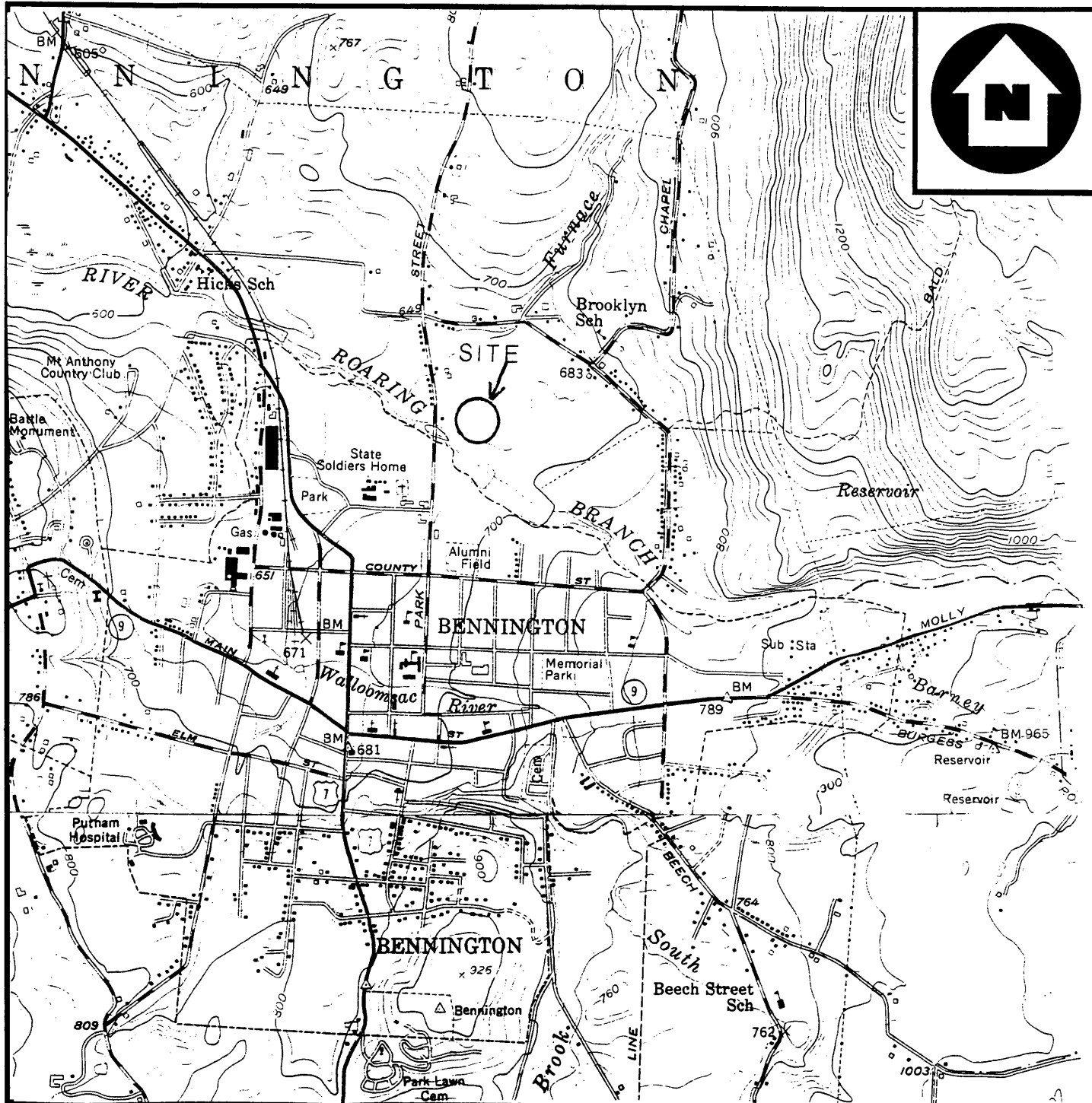
Following the completion of soil removal activities, IT/OHM personnel installed high-visibility fence at the entrance to the excavation, decontaminated the excavator, and secured area fences. In addition, START member Qualters conducted photodocumentation of the excavation and its

Jard Company Inc. Site File  
16 October 1998  
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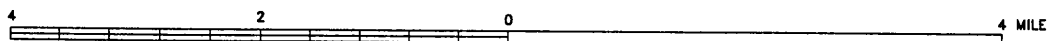
surroundings. IT/OHM members Caron, Speilman, and Bullock, RM Fort and START member Qualters then departed the Site.

## ATTACHMENT I

### Site Location Map



BASE MAP IS A PORTION OF THE FOLLOWING 7.5 MINUTE U.S.G.S. QUADRANGLE(S):  
 POWNAL, VERMONT 1942. FIELD CHECKED 1954. BENNINGTON, VERMONT 1942. FIELD CHECKED 1954



QUADRANGLE LOCATION

## SITE LOCATION MAP

JARD COMPANY INC.  
 BOWEN ROAD  
 BENNINGTON, VERMONT



REGION I SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM

TDD #  
 98-09-0002

DRAWN BY:  
 T. QUALTERS

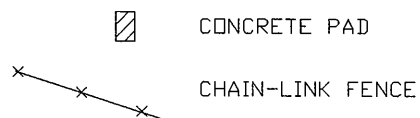
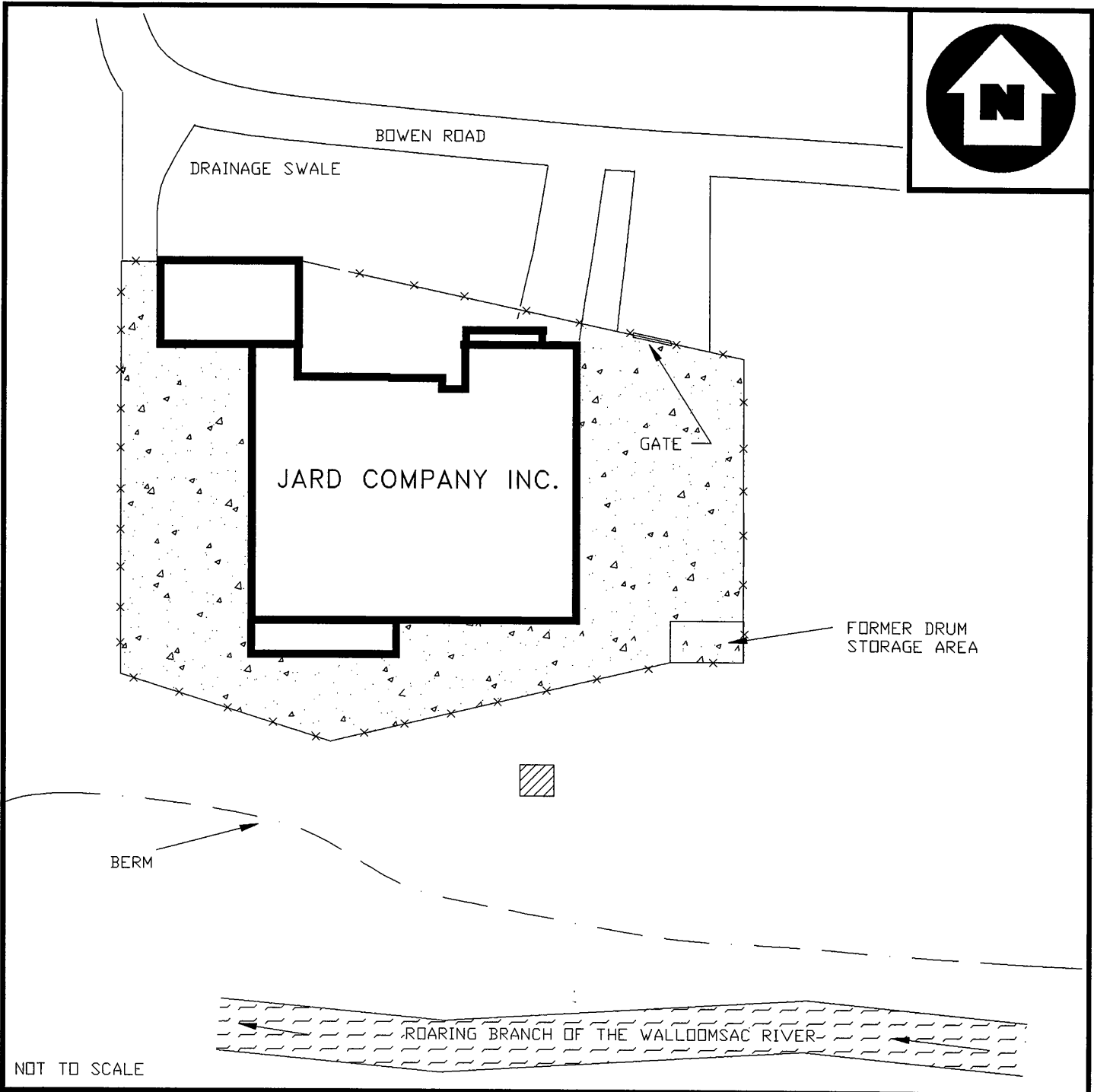
DATE  
 10/7/98

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FIGURE 1

## ATTACHMENT II

### Site Diagram



### LEGEND



PAVED AREA

SITE DIAGRAM  
JARD COMPANY INC.  
BOWEN ROAD  
BENNINGTON, VERMONT



REGION I SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM

TDD #  
98-09-0002

DRAWN BY:  
T. BORCI

DATE  
7/13/98

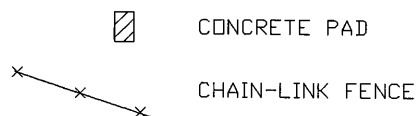
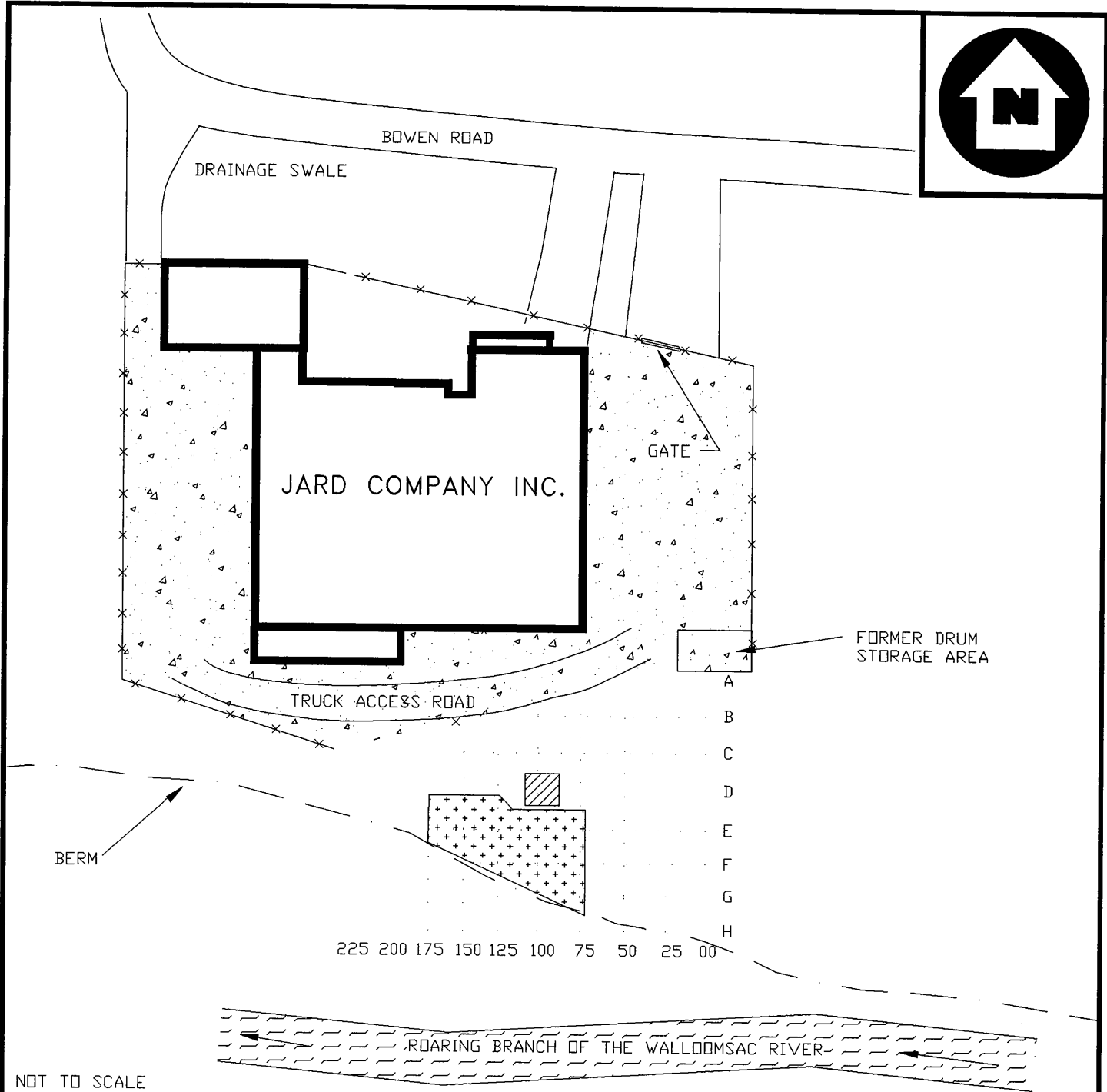
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FIGURE 2

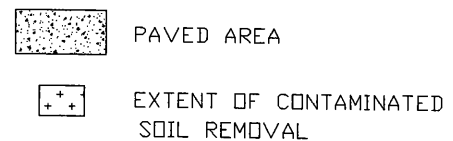
ATTACHMENT III

Extent of Excavation Map





### LEGEND



### EXTENT OF EXCAVATION MAP

JARD COMPANY INC.  
BOWEN ROAD  
BENNINGTON, VERMONT



MANAGERS DESIGNERS/CONSULTANTS

REGION I SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM

TDD #  
98-09-0002

DRAWN BY:  
T. BORCI

DATE  
10/7/98

FILE NAME:  
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FIGURE 3

ATTACHMENT IV

Off-Site Disposal Summary

**OFF-SITE DISPOSAL SUMMARY  
JARD COMPANY INC. SITE  
BENNINGTON, VERMONT  
21 SEPTEMBER THROUGH 2 OCTOBER 1998**

<b>Manifest Document No.</b>	<b>Transporter</b>	<b>Disposal Facility</b>	<b>Date of Shipment</b>	<b>Volume (Tons)</b>
1	Page E.T.C.	CWM	29-Sep-98	23.727
2	Page E.T.C.	CWM	29-Sep-98	22.954
3	Page E.T.C.	CWM	29-Sep-98	26.100
4	Page E.T.C.	CWM	29-Sep-98	23.409
5	Page E.T.C.	CWM	29-Sep-98	23.690
6	Page E.T.C.	CWM	29-Sep-98	21.090
7	Page E.T.C.	CWM	30-Sep-98	24.690
8	Page E.T.C.	CWM	30-Sep-98	25.618
9	Page E.T.C.	CWM	30-Sep-98	28.218
10	Page E.T.C.	CWM	30-Sep-98	25.891
11	Page E.T.C.	CWM	30-Sep-98	30.245
12	Page E.T.C.	CWM	30-Sep-98	31.336
13	Page E.T.C.	CWM	30-Sep-98	24.482
14	Page E.T.C.	CWM	30-Sep-98	25.891
15	Page E.T.C.	CWM	30-Sep-98	26.309
16	Page E.T.C.	CWM	01-Oct-98	30.000
17	Page E.T.C.	CWM	01-Oct-98	23.554
18	Page E.T.C.	CWM	01-Oct-98	26.309
19	Page E.T.C.	CWM	01-Oct-98	22.109
20	Page E.T.C.	CWM	02-Oct-98	24.909
21	Page E.T.C.	CWM	02-Oct-98	30.545
22	Page E.T.C.	CWM	02-Oct-98	33.736
<b>Total</b>				<b>574.812</b>

Note:

CWM - Chemical Waste Management